

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO: <i>Diane Kropf and Joseph Kropf v. Ethicon, Inc., et al.</i> Case No. 2:12-cv-01202	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**PLAINTIFFS' DESIGNATION AND
DISCLOSURE OF CASE-SPECIFIC EXPERT WITNESSES**

Pursuant to Pretrial Order (PTO) # 328, Rule 26 (a)(2) of the Federal Rules of Civil Procedure, Plaintiffs in the above-captioned civil action ("Plaintiffs") submit the following Designation and Disclosure of Case-Specific Expert Witness and persons who may provide expert testimony specific to Plaintiffs' case pursuant to Rule 702 of the Federal Rules of Evidence.

RETAINED EXPERT WITNESSES

- 1) Bruce Rosenzweig, MD (Urogynecologist)
Rush University Professional Building
1725 West Harrison Street, Suite 358
Chicago, IL 60612
- 2) Prof. Dr. Med. Uwe Klinge (Materials) (adoption of previously served reports)
KLINIK FÜR ALLGEMEIN-, VISZERAL- UND TRANSPLANTATIONSCHIRURGIE
RWTH Aachen und Universitätsklinikum Aachen
Pauwelsstraße 30
D-52074 Aachen
Germany
- 3) Dr. Daniel Elliott (Urologist) (adoption of previously served reports)
Mayo Clinic
200 1st Street SW
Rochester, MN 55902

- 4) Peggy Pence, PhD, RAC, FRAPS (Regulatory) (adoption of previously served reports)
Symbion Research International, Inc.
3537 Old Conejo Road, Suite 115
Newbury Park, CA 91320
- 5) Ricardo R. Gonzalez, MD
Clinical Assistant Professor of Urology
Baylor College of Medicine
Houston, TX

A General Designation and Disclosure has been or is being served by and on behalf of the wave 10 cases for general expert opinions. In the event that any of the general expert(s) identified above is/are unavailable for trial in this case, Plaintiffs reserve the right to elicit testimony, either through direct examination or cross-examination, of other of the general witnesses designated or identified by Plaintiffs. In no event, however, will Plaintiffs' retained experts at trial exceed five (5) experts without leave of Court for good cause shown. Plaintiffs further reserve the right, as allowed by Rule 26(e) of the Federal Rules of Civil Procedure, to supplement this Designation and Disclosure of Expert Witnesses through the discovery process upon receiving additional discovery including, but not limited to, expert depositions, fact depositions, exhibits introduced in depositions, documents produced, and any supplemental expert disclosures by any party.

Respectfully submitted,

KLINE & SPECTER, PC



BY:

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